Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	CC Docket No. 97-181
Defining Primary Lines	)	

COMMENTS OF SPRINT CORPORATION

Sprint Corporation hereby submits its comments on the Notice of Proposed Rulemaking released in the above-captioned docket on September 4, 1997 (FCC 97-316). In the Notice, the Commission seeks comment on a number of issues related to differentiating between primary and non-primary residential lines for purposes of assessing subscriber line charges (SLCs) and primary interexchange carrier charges (PICCs).

I. INTRODUCTION

As Sprint made clear in its comments in the Commission's Access Reform docket (CC Docket No. 96-262), Sprint would have preferred that the Commission take the direct approach to the recovery of non-traffic-sensitive costs, and recover all such costs directly from end-users through cost-based SLCs. Sprint reluctantly acquiesced in the PICC concept as a second-best alternative, only because that alternative was preferable to continued recovery of non-traffic-sensitive charges through traffic-sensitive, usage-based access charges. As the industry moves closer towards the intended January 1, 1998 date for implementing the revised access charge structure, however, Sprint is becoming increasingly concerned about the ability of the industry to properly implement the PICC charges – particularly differentiated charges between primary and non-primary residential lines, and about the initial and recurring costs that will be imposed on the industry to administer these differentiated residential PICCs. In fact, with the scheduled implementation date just three months away, Sprint believes it is highly doubtful that the LEC industry can implement any definition of primary/non-primary residential lines by January 1 and believes some delay is inevitable.

Because of these concerns, Sprint urges the Commission to consider further the wisdom and benefits of differentiating between primary and non-primary residential lines for purposes of assessing access charges under the revised structure.[1] With the Commission's implementation date for the new structure looming, Sprint believes that it would be far better for the Commission to dispense with its attempt to differentiate between primary and non-primary residential lines altogether. Sprint does not suggest that the Commission should load the additional revenue requirements that would have been recovered from non-primary residential lines (through higher PICCs or SLCs) back onto usage-based access charges, or onto the multi-line business PICC. Rather, the Commission should set the residential SLC and PICC at levels that represent the weighted average of the primary and non-primary line charges that the Commission contemplated in its Access Reform docket. Sprint estimates that this would initially increase the SLC for residential (and single line business) customers by an amount on the

[1] With respect to universal service, it is not clear that differentiation between primary and non-primary lines is necessary when the Commission implements a revised high-cost support mechanism. Sprint believes it would be reasonable for the Commission to conclude that persons able to afford more than one line should be expected to pay a cost-based charge for their first line, and that, as a result, no high cost support should be given to persons having more than one line.

order of $.50 per month (or less than the residential SLC would be today if it had been adjusted annually for inflation since its institution), and the increase in the initial residential PICC would be on the order of only $.07 per month. There is no reason to believe that these modest increases in the SLC would have any serious effect on the Commission's universal service goals; to the extent it has any effect at all, the Commission's expanded Lifeline/Linkup programs are available to address legitimate issues of need. By the same token, the reduced initial levels of non-primary residential SLCs and PICCs should stimulate demand for additional residential lines.

If the Commission determines to go forward with differentiated primary and non-primary residential SLCs and PICCs, then Sprint urges it to resolve the issues raised in the Notice on the basis of one overarching principle: keep it simple. Attempting to squeeze every last possible dime out of higher charges for non-primary residential lines may well wind up costing the industry more in administrative expense than it gains in revenues.

II. DEFINING SINGLE-LINE BUSINESS LINES (¶5)

Sprint supports maintaining the current definition of single-line businesses. This definition is well ensconced in existing administrative procedures, and there is no reason to create a new set of administrative problems for the industry at this time. Consistent with this definition, a business with a single line in each of two (or more) locations should be considered to be a multi-line business, as is the case today.[2] The Commission

[2] For example, the multi-line business SLC applies to payphones, even though a payphone provider may only have one payphone per location. See Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act

raises the question whether, if the current definition is maintained, a business that obtains one line from an ILEC and one from a CLEC would be treated as a single-line business, and if so, whether such treatment would be competitively neutral and consistent with the Joint Board's recommendations, in the Universal Service docket, on the level of the primary line SLC.

As is the case with residential lines, addressed below, it is possible that multi-line businesses will seek to avoid higher SLCs by obtaining each of their lines from a different carrier, but Sprint believes that such behavior on a widespread scale is highly unlikely, and the cost to the industry to police such behavior is not worth the amount of revenues involved. Having to deal with a different local carrier for each of its lines imposes additional costs on the business, such as having to review, approve and pay multiple bills each month, that are likely to outweigh the couple dollars or so per line that the business could save by doing so. Furthermore, the administrative burden on ILECs and CLECs of establishing mechanisms to police such behavior is far greater than the value to the ILEC of preventing such behavior. Nor would the attempt of a business to evade the higher multi-line business charge by dealing with separate carriers raise any significant issue of competitive neutrality.

III. DEFINING PRIMARY RESIDENTIAL LINES (¶¶6-16)

If the Commission proceeds to differentiate between "primary" and "non-primary" residential lines, the definition should be based not upon individual subscribers, residences, or households (as suggested in the Notice), but rather on the basis of existing

---

of 1996, 11 FCC Rcd 20541, 20634 (1996), rev'd on other grounds, Illinois Public

ILEC billing accounts. Thus, if a residential subscriber has only one line in his or her account, this would be the subscriber's "primary" residential line, regardless of whether other persons (related or not) at the same address also have accounts with the ILEC. If a subscriber has more than one line billed to a single account, the main billing number on the account would be defined as the primary line unless the customer otherwise notified the LEC, and all other lines would be non-primary. With this definition, an account verification letter would be sent only to current residential customers having multiple lines on one account. The verification letter would list the main billing number as the primary line and all other lines on the account as non-primary lines, and would inform customers of their right to make a different designation of their lines. Customers should be permitted to change their designation either by mail (e.g., using a tear-off reply card attached to the verification letter) or by phone to the LEC's business office. After this one-time verification process, line designation should be made during the normal ordering process.

This approach would minimize the administrative burdens on ILECs. For the LECs, having to administer any other definition (by subscriber name, by address, or by trying to ascertain which subscribers are members of the same household) would present an administrative nightmare that would substantially delay their ability to implement the Commission's revised access charge structure, with little apparent benefit. As in the case of business customers, discussed above, it is possible that customers who now have two lines billed to the same account might split up those lines into two separate accounts in

Telecommunications Association v. FCC, CADC No. 96-1394, July 1, 1997.

order to evade the higher SLCs or PICCs. However, it is not clear that it would be in the customer's interest to do so for very long. In the first place, there are non-recurring charges that would apply in such cases. Second, over time, the PICC charge the customer's long distance carrier will incur on the non-primary residential line (a charge that is likely to be passed through to the customer) will be less than the PICC charge on the primary residential line, thus counterbalancing the higher SLCs that apply to non-primary residential lines. Furthermore, residential customers will incur the added expense and inconvenience of having to make multiple payments each month if they attempt to split their lines in this fashion. To the extent that customers choose to split their accounts, however, Sprint believes that the difficulty in policing and administering definitions of lines by household or residence would far outweigh the amount of revenues at stake. For this purpose, then, Sprint would simply define "account" as the account maintained for residential customers by the LEC, and would include all lines maintained at the billed account basis.

If, alternatively, the Commission were to define the number and type of lines assignable to a particular residential customer on the basis of households, residences, etc., then the Commission correctly observes (Notice, ¶8) that existing LEC business records may be inadequate to identify the primary residential line. However, rather than make the LEC industry – ultimately at the expense of the public – go to the trouble of querying individual consumers to determine whose household or residence, etc., they fall within, and to obtain self-certification from <u>all</u> consumers to identify primary lines, it is far simpler and less burdensome to simply use LEC accounts as they exist.

Furthermore, Sprint does not share the Commission's view (¶10) that LECs should be required to maintain documentation of their customers' self-certifications. Such documentation would necessarily require customers to respond in writing. Rather, the rule should simply require designation of the billed number on the customer billing account record as the primary line unless the customer notifies the LEC, either in writing, by phone, or in person, that the customer wishes to change the configuration of the account or designate a different line for billing purposes.

With respect to instances where a residential customer obtains lines from both an ILEC and a CLEC that resells the ILEC's service (see ¶11 of the Notice), Sprint believes it is reasonable to presume that the second line ordered is the non-primary line (unless the customer indicates otherwise). Thus, if the customer already has a line from an ILEC at the time he or she orders a line from a CLEC, it is reasonable (absent a contrary indication from the customer) to presume that the ILEC line would be the primary line. Thus, the ILEC would be permitted to charge the CLEC the non-primary residential SLC, and to charge the IXC presubscribed to the CLEC's line the non-primary PICC charge. However, at the time it obtains the customer's order (or thereafter), the CLEC should have the right to inquire whether the customer wants that line, or its ILEC line, to be its "primary" line. If the CLEC informs the ILEC (e.g., via an entry on the Local Service Request) that the customer has designated its line, rather than the ILEC's line, as the primary line, the ILEC should honor that designation and bill the CLEC (and the presubscribed IXCs for each line) accordingly. If it wished to, the ILEC could then contact the customer and seek to persuade the customer to change its designation. It is important to emphasize that in the Sprint proposal, consumers retain full control of their line designations.

Undoubtedly, there may be instances of abuse in which CLECs (or ILECs) falsely report that customers have designated their lines as "primary" when in fact the customers have not done so. However, if (as many believe) the industry in the future will consist in large part of carriers that offer both interexchange and local service to subscribers, the incentive to engage in this abuse will be short-lived. Within a very few years, the sum of the SLC and PICC charges for primary residential lines is expected to equal the sum of these charges for non-primary residential lines. When this happens, there will be no particular advantage for a vertically integrated carrier to have its line designated as either the primary or non-primary line. In the meantime, attempts to police designations by consumers, by building paper and audit trails and instituting prescribed procedures for the LECs to follow, is simply not worth the cost. If, however, the Commission wants to impose elaborate procedures to govern CLEC/ILEC relationships, then it must recognize that neither carrier has any inherent right to be the principal point of contact for designation of the customers' lines, and should instead use a neutral third party to administer the process. Sprint recently proposed a similar use of a neutral third party to administer PIC changes.[3] Such a third party could be used to verify primary/non-primary line designations as well.

Finally, Sprint's proposal to use LEC account records to distinguish between primary and non-primary lines minimizes the privacy concerns (see Notice, at ¶16) that

[3] See Sprint's September 15, 1997 Comments in CC Docket No. 94-129.

could arise from residential PICC administration. Its proposal does not require consumers to divulge living arrangements, family relationships or any other personal information, other than the information normally gathered to open an account for local service. In short, Sprint's proposal requires divulgence only of the information now required of customers in the ordinary course of business and does not raise any new privacy concerns that must be addressed by the Commission.

IV. SPECIAL AUDIT AND ENFORCEMENT REQUIREMENTS NEED NOT BE IMPOSED AT THIS TIME, BUT ILECs MUST PROVIDE VERIFICATION FOR THEIR ACCESS BILLS (¶¶17-21)

Although the LECs' adherence to the rules Sprint proposed in Section III above, should be subject to the Commission's normal audit and enforcement processes, Sprint does not believe that any new special auditing and enforcement processes are necessary at this time. Although Sprint's "keep it simple" approach could lead unscrupulous carriers to abuse the rules, the amounts at stake per subscriber are too low to impose elaborate auditing systems and paper trails unless or until there is evidence of widespread abuse that normal enforcement measures do not adequately address.

However, Sprint agrees with the Commission's tentative conclusion (in ¶17) that each ILEC should verify to its carrier customers the number and type of PICCs being charged. This information must be conveyed on a customer-by-customer basis so that IXCs will know how to appropriately recover these access costs from each of their customers. Sprint's proposal to base the administration of PICCs on LEC account information should ease the burden on ILECs of furnishing this information. The Sprint LECs, for example, will use their carrier access billing system to generate a report to each

IXC detailing the lines that were PICed to it and whether each line is considered a primary or non-primary line. Any other definitional system would greatly complicate the ILECs' task of conveying such necessary information to their IXC customers.

V. SPRINT OPPOSES MANDATORY CONSUMER DISCLOSURE REQUIREMENTS AT THIS TIME (¶22)

In ¶22, the Commission seeks comment on whether it should require a uniform disclosure statement to be provided to consumers when the rate structure takes effect, when the subscriber orders service, etc. Sprint does not see the need for Commission-mandated disclosures to all consumers. As indicated above, Sprint's proposal would require consumer notification only for consumers who have multiple lines billed to a single account. A mandatory disclosure to other consumers will simply cause needless confusion among consumers who are unaffected by the rate structure change, prompting calls to customer service representatives that will needlessly burden the LEC industry with increased costs. Furthermore, if the Commission were to prescribe a notification, it is highly unlikely that the LECs could place such a statement in their customers' hands before January 1, 1998 without resorting to an expensive special mailing. With staggered billing cycles, carriers typically must arrange billing inserts at least 60-90 days in advance.

VI. CONCLUSION

As indicated at the outset, Sprint reluctantly acquiesced in the PICC concept as a second-best alternative to direct recovery of non-traffic-sensitive costs from the cost-causative customer. Many of the administrative burdens of implementing this PICC concept were not evident to Sprint at that time, or even when it sought clarification of various aspects of the PICC charges in its petition for reconsideration in CC Docket No. 96-262.[4] With the benefit of hindsight, Sprint urges the Commission to reconsider its determination to use PICCs in lieu of direct recovery of non-traffic-sensitive costs from subscribers or, if the Commission is unwilling to take that step, at least eliminate the distinction between primary and non-primary residential lines and instead charge a uniform SLC and PICC to both types of lines (and small business lines as well), using a weighted average of the previously contemplated separate charges so as not to reimpose additional costs on minute of use charges or the multi-line business PICC. If the Commission is unwilling to take either of these steps, then Sprint urges it to fashion a definition and administration mechanism with one injunctive in mind: keep it simple.

Respectfully submitted,

SPRINT CORPORATION

Leon M. Kestenbaum
Jay C. Keithley
H. Richard Juhnke
1850 M Street, N.W.
Washington, D.C. 20036
(202) 857-1030

September 25, 1997

[4] See Sprint's Petition for Expedited Reconsideration and Clarification, filed July 11, 1997.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Comments of Sprint Corporation was Hand Delivered or sent by United States first-class mail, postage prepaid, on this the 25th day of September, 1997 to the below-listed parties:

Joan C. Hesler

Joan A. Hesler

Sheryl Todd*
Accounting and Audits Div.
Federal Communications Comm.
2100 M Street, N.W., Room 8611
Washington, D.C. 20554

International Transcription Svc.
1919 M Street, N.W.
Washington, D.C. 20554

* Three copies submitted.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	CC Docket No. 97-181
Defining Primary Lines	)	

REPLY COMMENTS OF SPRINT CORPORATION

Sprint Corporation hereby replies to the initial comments of other parties in response to the Commission's Notice of Proposed Rulemaking in the above-captioned docket.

Because of the complexities of administering distinctions between primary and non-primary lines, Sprint's initial comments urged the Commission either to consider anew whether PICC charges are the proper means of recovering non-traffic sensitive costs, or at the very least consider eliminating the distinction between primary and non-primary residential lines and setting the SLC and PICC at a weighted average of the contemplated separate charges. Sprint also advised the Commission of its belief that the industry would not be ready to implement the primary/non-primary residential distinction by January 1, 1998.

With respect to the specific issues raised in the NPRM, Sprint proposed:

- To leave the definition of single line business unchanged.
- To define residential lines on the basis of existing account information, rather than on the basis of address, households or family units.
- To have the billing number on each account serve as the default primary line unless the customer notifies the LEC of a contrary intent.

- That no special audit or enforcement requirements are needed, but that ILECs must provide detailed information to IXCs for verification of their access bills.
- That no mandatory consumer disclosure requirements should be adopted.

After reviewing the comments of other parties, Sprint believes that only two issues merit discussion on reply: (1) whether any definition can be implemented by January 1, 1998 and (2) the definition of primary and non-primary residential lines.

With respect to the implementation date, both Bell Atlantic (at 8-9) and USTA (at 3-4) share Sprint's belief that the imposition of different charges for primary and non-primary residential lines must be deferred, and both parties endorse the one-year deferral USTA had also proposed in its petition for reconsideration of the Access Reform order. Only GTE (at 9, 15-16) predicts that it will be ready to implement the distinction by January 1, 1998 and then only if the Commission adopts GTE's proposal. Sprint believes that the industry as a whole will need additional time but does not believe the one-year extension sought by USTA is necessary. Instead, as long as the Commission adopts a readily implementable standard, such as Sprint and the vast majority of other commentors have proposed, the new definitions should be implementable by the July 1, 1998 effective date for the LECs' annual access filings. Sprint would also suggest that any delay in implementation of residential and non-primary residential PICCs not serve as a basis for deferring the timetable for upward adjustments to those charges set forth in the Access Reform order.

With respect to defining primary and non-primary residential lines, virtually all commentors addressing this issue agree with Sprint that the definitions should be based upon subscriber account information, although other parties formulate their proposal in slightly different terms.[1] The account-based approach would minimize the need for customer notification and establish a clear, easy to administer rule for determining which line in a multiple line account is the primary line: the billing number associated with that account, unless or until the subscriber notifies the carrier of a different intent.[2]

However, two of the RBOCs – Ameritech and U S West – would use service location (Ameritech) or residence (U S West) as the starting point, so that multiple accounts at a single address would have to be combined for purposes of defining primary and non-primary lines. Although U S West represents that, in its service region, its proposal would generate $17.7 million in additional PICC/SLC revenues (at first year rates) as compared with an account-based definition, the administrative burdens that all LECs would face in determining whether and how to combine separate accounts at a single address, plus the myriad of privacy and customer confusion issues that would be created by anything other than an account-based approach, far outweigh the additional

[1] See e.g., Bell Atlantic at 2 (billing name at a single service address), BellSouth at 6-7 (line should be defined in terms of named subscriber and serving address).

[2] Sprint's proposal would involve notification of only those accounts having more than one line. Sprint would allow LECs to use language of their own choosing to inform consumers of this default designation and the consumers' right to change that designation. Sprint would permit consumers to respond either in writing or orally. Thus, Sprint opposes the more burdensome balloting and random assignment procedures proposed by MCI (at 2-4) as well as prescribed language for the LECs' communications to their customers (id.).

revenues at stake. In cases where there are in fact different family units in the same residence, the Ameritech/U S West approach would preclude one (or more) of the family units from having a primary line designation. This is bound to cause at least confusion on the part of consumers, and more likely, ill will towards the Commission and the telephone industry. It also begs the question of why separate family units living at the same address should not be allowed to have fully separate telephone accounts. The administrative expense and consumer ill will that this proposal would cause is not worth the added SLC/PICC revenues in Sprint's view.

The other primary/non-primary line issue that merits additional discussion concerns cases in which a customer is served by both an ILEC and a reseller CLEC. Sprint's proposal (see Comments at 7-8) contemplated that such customers would only have one primary line, but that customers could give their primary line designation either to the ILEC or to the CLEC. Other commenting parties have slightly different approaches to this issue. Bell Atlantic (at 6-7) would define the first line purchased as the primary line. This proposal would (at least during the period of time when the combined SLC and PICC for the primary line is less than that for non-primary lines) unduly favor incumbent LECs, because their lines would nearly always have been ordered first and thus would have the lower charges associated with them. Southwestern Bell, Pacific Bell and Nevada Bell ("collectively, "SBC"), on the other hand, propose (at 4-6) that reseller CLEC lines be regarded entirely separately from the ILEC lines, so that a consumer having accounts with both a reseller CLEC and an ILEC would have a primary line from each.[3] In addition, SBC proposes that the ILEC charge the CLEC the primary SLC for the first resold CLEC line. On further reflection, Sprint supports the SBC approach as superior to the one Sprint proposed in its initial comments. SBC's proposal would avoid disputes between ILECs and CLECs over whether either carrier was properly conveying the wishes of the consumer, and would obviate the need for procedures and records to resolve such disputes.

Accordingly, Sprint urges the Commission to defer implementation of rate distinctions between primary and non-primary residential lines to July 1, 1998, to adopt Sprint's account-based approach to defining primary and non-primary lines, with the billing number as the default primary line unless the customer notifies the LEC to the contrary, and to adopt SBC's approach to reseller CLEC/ILEC relationships, namely, to allow subscribers to have a primary line from both a reseller CLEC and an ILEC and to require the ILEC to assess access charges accordingly.

Respectfully submitted,

SPRINT CORPORATION

Jay C Keithley

Leon M. Kestenbaum
Jay C. Keithley
H. Richard Juhnke
1850 M Street, N.W., 11th Floor
Washington, D.C. 20036
(202) 857-1030

October 9, 1997

[3] BellSouth also appears to take the same position. See BellSouth at 8.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing REPLY COMMENTS of Sprint Corporation was Hand Delivered or sent by United States first-class mail, postage prepaid, on this the 9th day of October, 1997 to the parties on the attached service list:

Joan A. Hesler

Joan A. Hesler

Sheryl Todd
Accounting and Audits Division
Federal Communications Commission
2100 M Street, N.W., Room 8611
Washington, D.C. 20554

International Transcription Svc.
1919 M Street, N.W.
Washington, D.C. 20554

Michael S. Pabian
Ameritech, Room 4H82
2000 W. Ameritech Ctr. Drive
Hoffman Estates, IL 60196

Lyman Welch
190 S. LaSalle Street, #3100
Chicago, IL 60603

Richard Karre
U S West, Inc.
1020 19th Street, N.W.
Suite 700
Washington, D.C. 20036

Richard McKenna
GTE Service Corporation
HQE3J36
P. O. Box 152092
Irving, TX 75015

Gail Polivy
GTE
1850 M Street, N.W.
Suite 1200
Washington, D.C. 20036

Edward D. Young III
Michael E. Glover
Betsy Roe
Edward Shakin
Bell Atlantic
1320 North Court House Road
Arlington, VA 22201

Mr. Robert Sutherland
Richard M. Sbaratta
BellSouth, Suite 1700
1155 Peachtree Street, NE
Atlanta, GA 30309

Robert M. Lynch
Durward D. Dupre
Michael Zpevak
Southwestern Bell
One Bell Ctr., Room 3524
St. Louis, MO 63101

Nancy Woolf
Pacific Bell
Nevada Bell
140 New Montgomery Street
San Francisco, CA 94105

Mary McDermott
Linda Kent
Keith Townsend
USTA
1401 H Street, N.W.
Suite 600
Washington, D.C. 20005

Bradley Stillman
Don Sussman
Alan Buzacott
MCI
1801 Pennsylvania Ave., N.W.
Washington, D.C. 20006

Peter Arth, Jr.
Lionel Wilson
Janice Grau
PUC of California
505 Van Ness Avenue
San Francisco, CA 94102

Werner Hartenberger
J. G. Harrington
Laura Phillips
Dow, Lohnes & Albertson
1200 New Hampshire Avenue, N.W.
Suite 800
Washington, D.C. 20036

Margot Smiley
Koteen & Naftalin
1150 Connecticut Ave., N.W.
Suite 1000
Washington, D.C. 20036

David Cosson
NTCA
2626 Pennsylvania Ave., N.W.
Washington, D.C. 20037

Lisa M. Zaina
Steve Pastorkovich
OPASTCO
21 Dupont Circle, N.W.
Suite 700
Washington, D.C. 20036

Stephen G. Kraskin
Kraskin & Lesse, LLP
2120 L Street, N.W., Suite 520
Washington, D.C. 20037

New York State
Telecommunications Assoc.
100 State Street, Room 650
Albany, NY 12207

CERTIFICATE OF SERVICE

I, Melinda L. Mills, hereby certify that I have on this 15th day of May 1998, served via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Comments of Sprint Corporation" in the Matter of Federal-State Joint Board on Universal Service, CC Docket Nos. 96-45, 97-160, filed this date with the Secretary, Federal Communications Commission, to the persons on the attached service list.

Melinda Mills

Melinda L. Mills

*	**Hand Delivery**
**	**Diskette**
#	**Facsimile**

The Honorable William Kennard*
Chairman
Federal Communications Commission
1919 M Street, NW -- Room 814
Washington, DC 20554

The Honorable Michael Powell*
Commissioner
Federal Communications Commission
1919 M Street, NW -- Room 844
Washington, DC 20554

The Honorable Susan Ness*
Commissioner
Federal Communications Commission
1919 M Street, NW -- Room 832
Washington, DC 20554

The Honorable Harold Furchtgott-Roth*
Commissioner
Federal Communications Commission
1919 M Street, NW -- Room 802
Washington, DC 20554

The Honorable Gloria Tristani*
Commissioner
Federal Communications Commission
1919 M Street, NW -- Room 826
Washington, DC 20554

The Honorable Julia Johnson
Chairman
Florida Public Service Commission
Gerald Gunter Building
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

The Honorable Kenneth McClure
Vice Chairman
Missouri Public Service Commission
301 W. High Street, Suite 530
Jefferson City, MO 65102

The Honorable Sharon L. Nelson
Chairman
Washington Utilities and Transportation Comm.
P.O. Box 47250
Olympia, WA 98504-7250

The Honorable Laska Schoenfelder
Commissioner
South Dakota Public Utilties Commission
500 E Capital Avenue
Pierre, SD 57501

Martha Hogerty
Public Counsel
Missouri Office of Public Counsel
P.O. Box 7800
301 West High Street, Suite 250
Jefferson City, MO 65102

Paul Pederson
State Staff Chair
Missouri Public Service Commission
P.O. Box 360
Truman State Office Bldg.
Jefferson City, MO 65102

Eileen Brenner
Idaho Public Utilities Commission
P.O. Box 83720
Boise, ID 83720-0074

Charles Bolle
South Dakota Public Utilties Commission
State Capital, 500 E. Capital Avenue
Pierre, SD 57501-5070

Don Schroer, Chairman
Lorraine Kenyon
Alaska Public Utilities Commission
10156West Sixth Avenue, Suite 400
Anchorage, AK 99501

Debra M. Kriete
Maureen Scott
Veronica A. Smith
Pennsylvania Public Utilities Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Mark Long
Florida Public Service Commission
Gerald Gunter Bldg.
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Samuel Loudenslager
Arkansas Public Service Commission
P.O. Box 400
Little Rock, AR 72203-0400

Sandra Makeeff
Iowa Utilities Board
Lucas State Office Bldg.
Des Moines, IA 50319

Philip F. McClelland
Pennsylvania Office of Consumer Affairs
1425 Strawberry Square
Harrisburg, PA 17120

Michael A. McRae
DC Office of the People's Counsel
1133 15th Street, NW -- Suite 500
Washington, DC 20005

Terry Monroe
New York Public Service Commission
Three Empire Plaza
Albany, NY 12223

M. Barry Payne
Indiana Office of Utility Consumer Counselor
100 North Senate Avenue
Room N501
Indianapolis, IN 46204-2215

Teresa Pitts
Washington Utilities and Transportation Comm.
P.O. Box 47250
Olympia, WA 98504-7250

James Bradford Ramsay
National Assoc. of Regulatory Utility Comm.
1201 Constitution Avenue, NW
Washington, DC 20423

Brian Roberts
California Public Utilities Commission
505 Van Ness Avenues
San Francisco, CA 94102-3298

Deborah Dupont*
Federal Communications Commission
2000 L Street, NW -- Room 257
Washington, DC 20554

William Howden*
Federal Communications Commission
2000 L Street, NW -- Room 812
Washington, DC 20554

Clara Kuehn*
Federal Communications Commission
2000 L Street, NW -- Room 257
Washington, DC 20554

Lisa Boehley*
Federal Communications Commission
2100 M Street, NW, Room 8605
Washington, DC 20054

John Clark*
Federal Communications Commision
2100 M Street, NW, Room 8619
Washington, DC 20554

Bryan Clopton*
FCC
2100 M Street, NW, Room 8615
Washington, DC 20554

Daniel Gonzalez*
FCC
1919 M Street, NW, Room 844
Washington, DC 20554

Emily Hoffnar*
FCC
2100 M Street, NW, Room 8623
Washington, DC 20554

L. Charles Keller*
FCC
2100 M Street, NW, Room 8918
Washington, DC 20554

David Krech*
FCC
2025 M Street, NW, Room 7130
Washington, DC 20554

Diane Law*
FCC
2100 M Street, NW, Room 8920
Washington, DC 20554

Robert Loube*
FCC
2100 M Street, NW, Room 8914
Washington, DC 20554

Tejal Mehta*
FCC
2100 M Street, NW, Room 8625
Washington, DC 20554

Kimberly Parker*
FCC
2100 M Street, NW, Room 8609
Washington, DC 20554

William Sharkey*
FCC
1919 M Street, NW, Room 534N
Washington, DC 20554

Richard D. Smith*
FCC
2100 M Street, NW, Room 8605
Washington, DC 20554

Brad Wimmer*
FCC
1919 M Street, NW, Room 518
Washington, DC 20554

Lori Wright*
FCC
2100 M Street, NW, Room 8603
Washington, DC 20554

Rafi Mohammed*
Federal Communications Commission
2000 L Street, NW -- Room 812
Washington, DC 20554

Andrew Mulitz*
Federal Communications Commission
2000 L Street, NW -- Room 257
Washington, DC 20554

Mark Nadel*
Federal Communications Commission
1919 M Street, NW -- Room 542
Washington, DC 20554

Gary Oddi*
Federal Communications Commission
2000 L Street, NW -- Room 257
Washington, DC 20554

Jeanine Poltronieri*
Federal Communications Commission
2000 L Street, NW -- Room 257
Washington, DC 20554

Jonathan Reel*
FEDERAL COMMUNICATIONS COMMISSION
2000 L Street, NW -- Room 257
Washington, DC 20554

Gary Seigel*
FEDERAL COMMUNICATIONS COMMISSION
2000 L Street, NW -- Room 812
Washington, DC 20554